

November 19, 2010

TO: Alisa Huckaby

FROM: Teresa Parsons, SPHR  
Director's Review Program Supervisor

SUBJECT: Alisa Huckaby v. Department of Ecology (ECY)  
Allocation Review Request ALLO-09-071

On August 4, 2010, I conducted a Director's review telephone conference regarding the allocation of your position. Present during the Director's review conference were you and Gus Gonzales, Council Representative, Washington Federation of State Employees (WFSE); Human Resources Consultant Corrina McElfish on behalf of ECY; your supervisor, Cleanup Section Manager Cheryl Whalen; and Nuclear Waste Program Manager Jane Hedges. After the Director's review conference, both parties submitted additional comments via email correspondence through September 3, 2010.

### **Director's Determination**

This position review was based on the work performed for the six-month period prior to July 24, 2009, the date you submitted your request for a position review to ECY's Human Resources (HR) Office. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of your assigned duties and responsibilities, I conclude your position is properly allocated to the Hydrogeologist 3 classification.

### **Background**

Your position is assigned to the Cleanup Section of the Nuclear Waste Program (NWP). Most of your work assignments during the time period relevant to this review pertained to the Hanford Site. The NWP manages waste, in part, by ensuring compliance with the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Restoration Compensation Liability Act (CERCLA) as well as other environmental regulations.

On July 24, 2009, you submitted a Position Review Request (PRR) to ECY's HR Office requesting that your Hydrogeologist 3 (HG 3) position (#2869) be reallocated to the Hydrogeologist 4 (HG 4) classification. On October 30, 2009, Ms. McElfish determined the duties and responsibilities assigned to your position best fit the HG 3 classification. Specifically, Ms. McElfish determined that the majority of your work did not fit the requirement of being designated in writing by the program manager to serve as a senior hydrogeologist. In addition, Ms. McElfish did not find that your work assignments met at least four of the seven distinguishing characteristics identified in the HG 4 class specification (Exhibit B-1).

On December 2, 2009, you requested a Director's review of ECY's allocation determination (Exhibits A-1 and A-2). I determined your request for a Director's Review had been timely filed because ECY delivered your allocation determination via alternate method, which you received on November 2, 2009. When delivered via alternate method, "service . . . will be regarded as completed when it is actually received . . ." (WAC 357-04-105(2)).

### **Summary of Ms. Huckaby's Perspective**

You assert you work independently and that the majority of your technical work on projects has not been subject to review or oversight by an HG 5 position. While you acknowledge you work with other positions, you assert your position serves as the technical lead on projects. You assert you have been performing lead RCRA permitting for the program and lead hydrogeologist project support without the review of the project manager, specialist, or your supervisor. You assert the project manager does not review your work product for technical accuracy or for technical decisions unless there is a conflict. You describe your work on Hanford Site RCRA groundwater permits as technically complex and regulatory, which you assert results in a significant amount of policy establishment. You also point out that permitting work is geographically located across the Hanford site. You contend these duties are higher than HG 3 level work. You also point out that you accept assignments from and report to all of the Nuclear Waste Program's project managers, as well as other section managers. You contend you perform work at the HG 4 level and believe your position should be reallocated.

### **Summary of ECY's Reasoning**

ECY asserts the Nuclear Waste Program functions on a team approach, using a matrix management system across the program, which includes project managers and team leads from all sections and specialty areas in the program. ECY acknowledges you make technical decisions as part of your work assignments without approval from your supervisor and that you perform a portion of a project's work. ECY also recognizes that you have served as a team lead on certain projects. However, ECY contends that technical oversight of your work and other team members contributing to a project is performed by a project manager and ultimately the section supervisor. For example, ECY agrees your position may write portions of permitting conditions that are part of a larger record; however, ECY asserts that others on the team also contribute to the record, which is then reviewed as a whole by the project manager designated by management. ECY acknowledges your work products and recommendations may contribute to policy decisions but emphasizes that your position

has not been assigned responsibility for establishing policy. ECY asserts the overall nature of your job involves permitting and asserts that your duties to review regulations and make recommendations fit within the scope of HG 3 level work.

### **Rationale for Director's Determination**

Both the Personnel Appeals Board (PAB) and Personnel Resources Board (PRB) have held that the purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

I reviewed all of the documents you submitted as exhibits. However, I focused on those exhibits that reflected work performed during the time period relevant to this review (January – July 2009).

On the Position Review Request (PRR), you describe your position's purpose as follows (Exhibit A-4-4 and B-5):

My position, as a hydrogeologist supports the mission by providing technical analysis of groundwater/vadose zone data to determine existing conditions, current and future impacts and current and future risk to human health and the environment to assist the program in determining the best remediation methods for cleanup and prevention of further contamination at Hanford.

The above description is also included in the Position Objective described on the Position Description Form (PDF) for your position, dated January 2007 (Exhibit B-4).

During the Director's review conference, both parties agreed the majority of your work assignments during the time relevant to this review involved work at the Hanford site. On the PRR, you describe the majority of your duties (80%) as reviewing a Remedial Investigation/Feasibility Study (RI/FS) for an area located on the Hanford Site. You describe the draft RI/FS as technically complex. You also assert "there are many data gaps and technical uncertainties that must be resolved to support final issuance of a CERCLA Record of Decision" (Exhibit A-4-4 and B-5). In general, your supervisor, Ms. Whalen, indicated the PRR accurately describes your work. However, both Ms. Whalen and Ms. Hedges clarified that a "planned workscope" and task assignments can change when working with U.S. Department of Energy documents. As a result, Ms. Whalen wrote a comment to that effect in the Supervisor Section of the PRR, noting, in part, "Alisa's defined job duties . . . do not reflect her planned workscope or her PDP [Performance Development Plan]" Exhibit B-5, page 4). Ms. Whalen further emphasized the permitting nature of your job duties, which she stated has not changed.

In addition, a summary of your duties and responsibilities described on the PDF includes performing state and federal environmental compliance and enforcement; developing, coordinating, implementing, and evaluating scientific sampling data analysis plans, cleanup action plans, and other technical/compliance documents relating to surface water issues impacting the cleanup of Hanford; gathering and analyzing information to develop recommendations; and providing comprehensive hydrogeologic services to project managers, other statewide specialists, and section managers. The PDF further indicates that your position independently reviews, comments, and prepares technical reports on Hanford Site RCRA, MTCA, and CERCLA permitting and remediation projects; evaluates compliance with Tri-Party Agreement; coordinates with statewide specialists and project managers on surface water issues; participates in NWP work plan development; and prepares monthly reports for section manager and appropriate project managers.

Ms. Hedges explained the matrix management configuration used for projects in the Nuclear Waste Program. A review of the organizational chart shows four technical sections including Tri-Party Agreement, Tank Waste Treatment, Cleanup and Waste Management (Exhibit B-7). Technical positions include Environmental Engineers and Specialists, NWP Specialists, Chemists, and Hydrogeologists. Each section is supervised by a Washington Management Service (WMS) position. Your position is located in the Cleanup Section, and you report to Ms. Whalen. In the matrix configuration, Ms. Hedges indicated that management will designate one of the technical/specialist positions to serve as project manager (also referred to as project lead) to manage a cross-sectional team that includes a variety of positions throughout the Nuclear Waste Program. The project manager oversees the project and determines which areas of expertise are needed. Within the project, team leads may also be assigned to coordinate the work of the project. Both project managers and team leads report to one of the WMS section managers, like Ms. Whalen. The section manager actually verifies and assigns the work, though project managers may assign specific task assignments. The section managers, along with Ms. Hedges as the Nuclear Waste Program Manager, have ultimate responsibility and oversight of projects.

During the Director's review conference, Ms. Whalen acknowledged that you have been assigned the team lead on a couple of projects. You agreed the team lead is responsible for coordinating the work of the project. For clarification, a team lead differs from a lead worker assigned the responsibility to "regularly assign, instruct, and check the work of . . . employees on an ongoing basis" (Department of Personnel's Glossary of Classification Terms). <http://www.dop.wa.gov/CompClass/CompAndClassServices/Pages/HRProfessionalTools.aspx>.

Although you served as a team lead on certain projects, your work was still reviewed by the project manager as well as your supervisor, Ms. Whalen, as the section manager. The project managers during this review period were some of your co-workers in specialty positions within the Cleanup Section. As a member of a team, you performed a component of the work product, conducted peer reviews, and provided input and recommendations. This team approach is supported by statements from all parties during the Director's review conference, as well as a number of documents that illustrate how the team interacted to accomplish the work of the project (Exhibits include A-4-5; A-4-19; A-4-20; A-4-21; A-4-32; A-5-12; A-5-13).

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations.

The **Hydrogeologist 4 definition** reads as follows:

In the Department of Ecology, and designated in writing by a program manager equivalent or higher, serves as a senior hydrogeologist planning, developing, conducting, directing and/or overseeing independent hydrogeologic projects or investigations within a region or at headquarters and meets four (4) of the distinguishing characteristics for the class.

The **Hydrogeologist 4 distinguishing characteristics** have been described as follows:

- Has lead responsibility within a program for the development of statutes, new regulations, policy, or technical guidelines relating to hydrogeologic issues.
- Provides direction to two or more agency professional staff.
- Manages projects which have been delegated in writing by a Program Manager, equivalent, or higher.
- Develops, prepares, presents expert testimony as designated in writing by and described on a Classification Questionnaire approved by a Program Manager.
- Reports status and/or results of hydrologic issues and analyses to a Program Manager, Regional Director, equivalent, or higher.
- Performs technical peer review of hydrogeologic activities/reports for cross-program/agency group and/or cross-section as designated in writing by and described on a Classification Questionnaire approved by a Program Manager.
- Serves as a technical expert for a program in a hydrogeologic specialty as designated in writing by and described on a Classification Questionnaire approved by a Program Manager.

Ms. Hedges is the Nuclear Waste Program Manager. She has not designated your position to serve as a senior hydrogeologist responsible for planning, developing, conducting, directing, or overseeing independent hydrogeologic projects or investigations. While you have served as a team lead on certain projects, you have not been designated as the project manager. Your duties and responsibilities to develop, coordinate, and implement the technical analysis of groundwater data supports the projects that are directed by the project manager and ultimately the section manager.

Additionally, allocation to the Hydrogeologist 4 level requires your position to meet at least four of the distinguishing characteristics noted above. While your position meets certain aspects identified in the distinguishing characteristics, such as performing a technical peer

review, your review is part of a team effort in which other specialist positions are reviewing the same material and providing input and recommendations as well. Similarly, the technical decisions you make, such as writing permit conditions or authoring recommended changes, are within the context of a larger body of work that is subject to review by the project manager and ultimately your supervisor or one of the other section managers within the Nuclear Waste Program.

While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification. The HG 4 typical work examples reflect a higher level of work than the work assigned to your position. For example, HG 4 positions typically develop policies and procedures; establish water quality data collection; direct or manage major field studies and technical evaluation; direct the preparation and review of formal responses; plan, coordinate, and direct special projects, and coordinate program activities with other agency programs or outside entities. Your work products and recommendations contribute to policy development and serve as a component of a larger product such as a RI/FS or CERCLA Record of Decision.

The **Hydrogeologist 3** has been defined as follows:

In the Department of Ecology, plans, serves as a project hydrogeologist independently planning, developing, directing, conducting and/or overseeing hydrogeologic analyses and technical services for ground water, unsaturated zone and/or surface water investigations.

Your position independently provides complex, comprehensive hydrogeology support to projects involving environmental restoration and waste management at the Hanford Site. This includes technical analysis of groundwater/vadose zone data to determine existing conditions and make recommendations regarding cleanup plans. As part of a team, your position reviews work plans, authors a portion of the review comment records, reviews regulations, writes permit conditions, and makes recommendations. Your position also provides team leadership with regard to hydrogeologic analyses and technical services.

While there are no specific distinguishing characteristics identified for the HG 3 class, the typical work examples that most align with the work assigned to your position include the following:

- Planning and conducting professional investigations and providing comprehensive hydrogeologic services to other sections, programs, or regional offices in the department;
- Reviewing major ground water and surface water development projects; hydrogeologic research; complex investigations of water right conflicts; development and use of computer models to analyze site specific concerns; water quality and contamination problems; and administration of the Water Code, Ground Water Quality Standards, Waste Regulations, or related State and Federal laws and regulations; consults with management personnel to define project goals and objectives;

- Reviewing and preparing technical reports;
- Planning and conducting ground or surface water studies . . . providing project leadership for collection of data on depth to ground water, well yields, and the extent of ground water contamination; designing and evaluating technical adequacy of ground water monitoring networks; determining effects of ground water withdrawals on surface water; . . . determining hydrogeologic relationships in migration and accumulation of contaminants; conducting advanced hydrogeologic analysis . . . conducting surface and ground water supply studies . . .;
- Providing professional implementation and enforcement of state laws and regulations.

I recognize the work you perform is specialized and complex. A position's allocation does not diminish the quality of work performed. Further, a position's allocation is not a reflection of performance or an individual's ability to perform higher level work. Rather, an allocation is based on the majority of work assigned to a position. The HG 3 is the best fit for the overall duties and responsibilities assigned to your position.

### **Appeal Rights**

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board . . . . Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located at 600 South Franklin, Olympia, Washington. The main telephone number is (360) 664-0388, and the fax number is (360) 753-0139.

If no further action is taken, the Director's determination becomes final.

c: Gus Gonzales, WFSE  
Corrina McElfish, ECY  
Lisa Skriletz, DOP

Enclosure: List of Exhibits

Alisa Huckaby v. Department of Ecology  
ALLO-09-071  
List of Exhibits

**A. Alisa Huckaby Exhibits**

1. Letter of Appeal from Alisa Huckaby November 28, 2009
2. Basis for Appeal of Alisa Huckaby's Position Review (23pg)
3. Allocation Determination Letter October 30, 2009
4. List of Attachments to Basis of Position Review Appeal 1-38  
(See attached list of Exhibits A-4)
5. Additional Exhibits 1-15 (See attaché list of Exhibits A-5)

**B. Department of Ecology Exhibits**

1. Allocation Determination Letter October 30, 2009 (Duplicate of A-3)
2. Class Specifications: Hydrogeologist 3
3. Class Specifications: Hydrogeologist 4
4. Position Description for Ms. Huckaby's position #2869
5. Position Review Request and supervisor's comments received in HR on July 24, 2009 (Duplicate of A-4-4)
6. E-mail from Cheryl Whalen to Alisa Huckaby dated October 21, 2009 regarding her performance expectations.(Duplicate of A-4-15 & 29)
7. Organizational Chart for the Nuclear Waste Program dated October 26, 2009
8. Guidance document from the DOP website: The purpose of reviewing a Positions Allocation
9. Guidance document from the DOP website: Key documents used for an Allocation Review.
10. March 8, 2010 letter to Karen Wilcox from Corrina McElfish in response to Ms. Huckaby's exhibits, stating that a number of exhibits do not meet allocating criteria. ECY provided the following to demonstrate Ms. Huckaby serves as part of a team:
  1. July 27, 2009 email from Mandy Jones to Alisa Huckaby and others with attached Review Comment Record (RCR) example.
  2. August 26, 2009 email from Alisa Huckaby to John Price & Mandy Jones regarding comments in RCR.

**C. Correspondence regarding timeliness of Ms. Huckaby's request for a Director's Review.**

**D. Correspondence after the Director's Review Conference**

1. August 12, 2010 email from Alex Monroe (ECY) with attached PDF (duplicate of B-4).
2. August 31, 2010 email from Corrina McElfish in response to the relevance of exhibits submitted by Ms. Huckaby.
3. September 1, 2010 email between Alisa Huckaby and Teresa Parsons regarding Ms. Huckaby's opportunity to respond to ECY's comments in exhibit D-2 above.



4. September 3, 2010 email from Alisa Huckaby in response to ECY's comments in exhibit D-2, asserting the relevance of the exhibits she submitted.

**Exhibit A-4**

List of Attachments to Basis of Position Review Appeal  
(Comments in italics added by Teresa Parsons for clarification)

1. Department of Ecology Position Review Request (ECY 070-310 revised 12/2007)
2. Guide to Completing the Department of Ecology Position Review Request (Revised 12/2007)
3. Filtering letter and attachment
4. Position review request that Alisa Huckaby submitted that includes manager Cheryl Whalen's input, Cheryl Whalen's signature, and Jane Hedges' (Nuclear Waste Program Manager) signature
5. August 20, 2009 email from Les Fort with subject "Task Plan: 200-UP-1 Groundwater Remedial Design/Remedial Action Work Plan Review" (*Beyond timeframe but illustrates team structure and task assignments*).
6. Department of Ecology Performance and Development Plan signed 11/28/07
7. Department of Ecology Performance and Development Plan signed November 10, 2008
8. April 16, 2009 email from Cheryl Whalen to Nuclear Waste Program with subject "Posting of HG-4 Position" (*job posting – outside scope of allocating criteria*)
9. July 14, 2009 email from Alisa Huckaby to Cheryl Whalen (copying Program Manager Jane Hedges) with subject "Work Assignment Concerns" (*Ms. Huckaby's argument regarding the level of work*)
10. July 20, 2009 email reply from Cheryl Whalen to Alisa Huckaby (copying Program Manager Jane Hedges) with subject "Work Assignment Concerns" (*in response to argument on level of work assigned*)
11. April 3, 2009 Staff Workload – Details w/Workscope
12. "Project: 100-DH RI FS work plan review" schedule dated 5/26/09
13. Alisa Huckaby's Time Sheets for July 16, 2009 through September 15, 2009
14. U.S. Department of Energy Richland Operations Office November 24, 2009 FY2009/10 Briefing to Washington State Department of Ecology and Environmental Protection Agency
15. October 21, 2009 Email from Cheryl Whalen to Alisa Huckaby Regarding "Request" (*beyond timeframe but illustrates team structure and peer review*)
16. Department of Ecology Performance and Development Plan for period from 10/1/08 to 9/30/09 signed by Alisa Huckaby on November 19, 2009 (*describes the evaluation of work performed during review period; ECY states this is not the final version*)
17. May 18, 2009 email from Jeff Lyon to Alisa Huckaby Regarding "Thank You!" (*references Ms. Huckaby's interview for HG 4 position – beyond scope of review*)
18. July 14, 2009 email from Alisa Huckaby to Cheryl Whalen (with program manager copied) with Subject "Work Assignment Concerns" (*Duplicate of A-4-9 & 10 above*)
19. July 23, 2009 email from Alisa Huckaby to Mandy Jones with attached Section 4.5 review comments (*Example of comments provided to project manager*)

20. July 25, 2009 email from Alisa Huckaby to Mandy Jones with attached Section 4.8, Plates, and SAP review comments
21. August 10, 2009 email from Project Manager Mandy Jones with subject "DOE responses on RI/FS Work Plan with attached responses
22. July 20, 2009 email from Section Manager Cheryl Whalen to Alisa Huckaby with subject "RE: Work Assignment Concerns" (*Forwarded to Karen Wilcox, Director's Review Office, regarding Ms. Huckaby's assertion of performing HG 4 work*)
23. May 1, 2009 email from Project Manager Jeff Lyon to Alisa Huckaby with subject "RE: C WMA"
24. October 22, 2009 email from Section Manager Cheryl Whalen to Alisa Huckaby with subject "RE: 100-NR-1 design drawings" (*regarding work assignments beyond review period*)
25. 2 ½ pages of concerns discussed with Section Manager Cheryl Whalen in late July 2009 regarding lack of HG-5 and HG-4 support
26. October 20, 2006 email from Alisa Huckaby to Cheryl Whalen with subject "Proj Man Eval Feedback"
27. October 27, 2009 email from Jacqui Seiple to Cheryl Whalen with subject "Hiring and staff morale" (*Beyond timeframe and outside scope of allocation review*)
28. Draft "Waste Management Area (WMA) TX-TY Groundwater Monitoring [WAC 173-303-815]" RCRA permit conditions
29. October 21, 2009 email from Cheryl Whalen to Alisa Huckaby with subject "RE: Request" (*Duplicate of A-15*)
30. "History of Effluent Control and Groundwater Remedial Actions at 100-N"
31. Project Status of the "In-Situ Apatite Barrier for Strontium-90 100-NR-01/NR-02 Operable Unit" (dated April 14, 2009)
32. July 28, 2009 email from Les Fort to James Faurote with subject "RE: Meeting to review 100-N Plates" (*Illustrates coordination work as part of team*)
33. August 26, 2009 email from Les Fort to Mike Thompson with subject "FW: Task Assignment, : Review of Revised 100-NR-02 Jet Injection Treatability Test Plan (TTP)" and attached responses from the U.S. Department of Energy (*Beyond timeframe but illustrates task assignments by project manager*)
34. November 13, 2009 email from Cheryl Whalen to Alisa Huckaby with subject "RE: Performance & Development Plan and Position Description" (*Beyond timeframe; illustrates disagreement on level of work*)
35. November 13, 2009 email from Cheryl Whalen to Alisa Huckaby with subject "RE: Performance & Development Plan and Position Description" (*Duplicate of #34 above*)
36. November 17, 2009 email from Cheryl Whalen to Jeanne Wallace with subject "RE: Potential Safety Team Issue" (*Beyond scope of allocation review*)
37. Letter dated November 18, 2009 from Cheryl Whalen to Frank Roddy Re: "Approval of Request for Variance for Treatability Test Horizontal Borehole at 100-D", letter attachments, and email train Re: "100D directional drilling test C7516-Daily Status Update for November 13, 2009

38. Emails starting from November 13, 2009 through November 17, 2009 with subject "RE: 100D directional drilling test C7516-Daily Status Update for November 13, 2009"

**Exhibit A-5**  
**Additional Exhibits**  
(January 28, 2010)

*Note: The majority of these exhibits are beyond the timeframe and scope of this allocation review. Exhibits 12 & 13 illustrate work Ms. Huckaby contributed to Review Comment Records; Exhibit 14 is a report showing that work plan comments were resolved, which likely included work from earlier timeframe.*

1. January 6, 2010 memorandum from Joseph Caggiano and Jacqueline Seiple to Jane Hedges, Cheryl Whalen, and Dib Goswami regarding "Management Approval of WAC 173-160 Variance Request for 100-D Horizontal Well.
2. Summarization memo written by Jean Vanni
3. Nuclear Waste Program Phone List
4. Microsoft Outlook Schedule meeting description for November 3, 2009 organized by Les Fort with Cheryl Whalen
5. Microsoft Outlook Schedule for NWP management retreat on January 12, 2010 description with agenda topic "Communication – dealing with the negative messengers".
6. Microsoft Outlook Schedule for 100 N RI/FS Data Meeting on 2/17/2010 from 8:00 am to 4:00 pm
7. Grievance filed December 7, 2009 regarding violation of General Government Collective Bargaining Agreement 2009-2011 Article 4.5.A.1
8. January 6, 2010 grievance meeting (regarding NWP management's violation of Collective Bargaining Agreement Article 4.5.1.A) talking points
9. Ecology's Environmental Justice Team Roster.
10. Microsoft Outlook Schedule for Zelma Jackson for months August 2009 through January 2010.
11. Microsoft Outlook Schedule for Nina Menard for months September 2009 through November 2009.
12. Review Comment Record (RCR) dated July 27, 2009 includes review comments associated with a document that addresses CERCLA investigation in the 100 Areas of the Hanford Site.
13. Review Comment Record (RCR) dated July 27, 2009 includes review comments associated with a document that addresses CERCLA investigation in the 100-D, 100-H, and Horn Areas of the Hanford Site.
14. January 7, 2010 monthly report for December 2009 from Cheryl Whalen, Cleanup Section Manager to Jane Hedges, Program Manager.
15. Revised Code of Washington (RCW) Chapter 18.220 section titles and RCW 18.220.020.